

REMARKS

Claims 1 through 23 were presented for examination and were rejected.

The applicants respectfully traverse the rejections and request reconsideration in light of the following comments.

35 U.S.C. 102 Rejection of Claims 1-4

Claims 1 through 4 were rejected under 35 U.S.C. 102(e) as being anticipated by X. He et al., U.S. Patent Application Publication No. US 2004/0105412 A1 (hereinafter "He"). The applicant respectfully traverses the rejection.

Claim 1 recites:

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| <p>1. An apparatus comprising:</p> <p>(a) a plurality of access points, wherein <i>each of said access points performs a first protocol service</i> for a respective network, and wherein <i>the correctness of said first protocol service is based on a maximum timing delay</i>; and</p> <p>(b) a central controller for:</p> <p>(i) receiving an input signal from each of said plurality of access points, and</p> <p>(ii) transmitting to each of said plurality of access points an output signal based on the input signal from that access point and <i>a second protocol service, wherein the correctness of said second protocol service is independent of said maximum timing delay.</i></p> |
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Nowhere does He teach or suggest, alone or in combination with the other references, what claim 1 recites – namely characterizing protocol services based on whether or not their correctness is independent of a maximum timing delay. He differs from the present invention as recited in claim 1 in several important ways.

First, while He does disclose an enhancement to the IEEE 802.11 family of protocols (as does the present invention), He mentions absolutely nothing about the correctness of IEEE 802.11 services with respect to maximum timing delay.

Second, He mentions nothing about partitioning existing IEEE 802.11 services between two different types of apparatuses (e.g., an access point and a central controller, etc.). Rather, He teaches a "point coordinator" that is simply a conventional access point

programmed to perform an additional function. This additional function is not an existing IEEE 802.11 service that is moved to the point coordinator from other access points.

Third, in He all of the access points can become a point coordinator, which means that all of the nodes are the same – namely, conventional IEEE 802.11 access points with an additional function programmed in their software. In contrast, in the present invention the controller is different than the access points.

For these reasons, the applicant respectfully submits that the rejection of claim 1 is traversed.

Because claims 2 through 4 depend on claim 1, the applicant respectfully submits that the rejection of these claims is also traversed.

35 U.S.C. 103 Rejection of Claims 5-19

Claims 5 through 19 were rejected under 35 U.S.C. 103(a) as being unpatentable over He in view of Y. Liu et al., U.S. Patent 7,209,467 (hereinafter "Liu"). The applicant respectfully traverses the rejection.

Liu does nothing to cure the deficiencies of He: Liu, like He, mentions nothing about characterizing a protocol service by whether or not its correctness is independent of a maximum timing delay. Furthermore, Liu, like He, teaches nothing about employing two different types of apparatuses in a network – let alone partitioning protocol services between the two types of apparatuses.

For these reasons, the applicant respectfully submits that the rejection of claims 5 and 6 – which depend on claim 1 – are traversed.

For these same reasons, the applicant respectfully submits that the rejection of independent claim 7, and its dependent claims 8 through 19, is also traversed.

35 U.S.C. 103 Rejection of Claim 20-23

Claims 20 through 23 were rejected under 35 U.S.C. 103(a) as being unpatentable over He in view of Liu, in further view of P. Balogh, U.S. Patent 6,870,822 (hereinafter "Balogh"). The applicant respectfully traverses the rejection.

Balogh, like He and Liu, mentions nothing about characterizing a protocol service by whether or not its correctness is independent of a maximum timing delay. For this reason, the applicant respectfully submits that the rejection of independent claim 20, and its dependent claims 21 through 23, is traversed.

Request for Reconsideration Pursuant to 37 C.F.R. 1.111

Having responded to each and every ground for objection and rejection in the Office action mailed June 8, 2007, applicants respectfully request reconsideration of the instant application pursuant to 37 CFR 1.111 and request that the Examiner allow all of the pending claims and pass the application to issue.

If there are remaining issues, the applicants respectfully request that Examiner telephone the applicants' attorney at 732-578-0103 x11 so that those issues can be resolved as quickly as possible.

Respectfully,
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